

THE HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BUNGIE, INC., A DELAWARE  
CORPORATION,

Plaintiff,

v.

AIMJUNKIES.COM, A BUSINESS OF  
UNKNOWN CLASSIFICATION; PHOENIX  
DIGITAL GROUP LLC, AN ARIZONA  
LIMITED LIABILITY COMPANY; JEFFREY  
CONWAY, AN INDIVIDUAL; DAVID  
SCHAEFER, AN INDIVIDUAL; JORDAN  
GREEN, AN INDIVIDUAL; AND JAMES  
MAY, AN INDIVIDUAL,

Defendants.

No. 2:21-cv-811-TSZ

PLAINTIFF'S MOTION FOR ENTRY  
OF DEFAULT AGAINST  
DEFENDANTS PHOENIX DIGITAL  
GROUP LLC, JEFFREY CONWAY,  
DAVID SCHAEFER, JORDAN  
GREEN, AND JAMES MAY

NOTE FOR MOTION CALENDAR:  
NOVEMBER 19, 2021

TO: Clerk of the United States District Court,  
Western District of Washington at Seattle;

Plaintiff Bungie, Inc. ("Bungie" or "Plaintiff") hereby moves the Clerk of Court to enter default against defendants Phoenix Digital Group LLC ("Phoenix Digital"), Jeffrey Conway, David Schaefer, Jordan Green, and James May ("Defendants") for failure to plead or otherwise respond to Plaintiff's Complaint. This Request is based on Federal Rule of Civil Procedure 55(a),

PLAINTIFF'S MOTION FOR ENTRY OF  
DEFAULT  
(No. 2:21-cv-811-TSZ) – 1

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1 W.D. Wash. Local Civil Rule 55(a), and the Declaration of William C. Rava in Support of  
2 Plaintiff's Motion for Entry of Default filed herewith.

3 A proposed order for entry of default accompanies this motion.  
4

5 Dated: November 19, 2021

By: s/ William C. Rava

William C. Rava (SBN WA 29948)

Jacob P. Dini (SBN WA 54115)

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*Attorneys for Plaintiff Bungie, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that they electronically filed the foregoing Motion and that I caused the foregoing document to be served on the person(s) listed below in the manner shown:

Kevin Martin  
Martin APC  
4200 Park Blvd. #656  
Oakland, CA 94602  
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☐ Hand Delivery  
☐ First Class U.S. Mail (postage-prepaid)  
☒ Email  
☒ U.S. Mail  
☐ Via Facsimile

DATED: November 19, 2021

  
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Jackie Slavik